

EXHIBIT 1

**Plaintiffs' More Definite Statement as to
Defendant Mamoun Darkazanli**

1. Plaintiffs hereby incorporate all allegations and counts contained in the Third Amended Complaint in Burnett, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC), 03 CV 5738 & 03 CV 9849; World Trade Center Properties LLC, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC); 04 CV 7280 (RCC); and Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC); 04 CV 7279 (RCC), including all of the allegations and claims contained therein.

Background Information on Darkazanli and the Darkazanli Import-Export Company

2. Mamoun Darkazanli, aka Abu Ilias, aka Abu Al Loh, was born in Syria and resides in Hamburg, Germany. He was a naturalized German citizen who moved to Hamburg from Syria in 1982.

3. Mamoun Darkazanli and Darkazanli Import-Export Company are listed as specially designated global terrorists by the U.S. Treasury Department. With its designation on September 24, 2001, the Darkazanli Import-Export Company was the first private business to have its assets frozen by President Bush for financially supporting al-Qaeda.

4. A few weeks later, on October 12, 2001, Mamoun Darkazanli himself was designated as a financier of al-Qaeda. In a press release marking the designation, the Treasury Department described him as "a well connected bin Laden agent" and that "Darkazanli is wanted for his role in the US Embassy bombings in Africa."

5. The Treasury Department's assertion is explained by Darkazanli's financial relationship during the planning and execution of the 1998 Embassy Bombings with two of al-Qaeda's most prominent members, Wadih el-Hage and Mahmoud Salim. Unlike his two associates, Darkazanli was not arrested following the bombings and he continued to knowingly provide support to al-Qaeda by aiding the Hamburg cell for the September 11th attacks.

6. Mamoun Darkazanli, who was arrested in Hamburg in October of 2004 on charges that he "helped fund the al-Qaeda terrorist network for years and who is seen in a video at a mosque with some of the September 11 hijackers." According to the Hamburg authorities, "Darkazanli is alleged to have been involved in the purchase of a ship for bin Laden, handling administrative details, and paying bills. He also allegedly traveled to Kosovo in late 2000 on an al-Qaeda mission."

Darkazanli and Money

7. German authorities analyzed the banking accounts of Mamoun Darkazanli and they found the following banking information:

Account with Deutsche Bank of Hamburg, number 600-400721700 which was owned by Mamdoh Mahmoud Ahmed Salim aka Abu Hajar. He is the co-founder

of AQ, Financial Chief. He was detained in Germany on September 16th 1996 and extradited to the United States where he was charged for conspiracy to murder American citizens, utilizing weapons of mass destruction and for having transported explosives, in connection with the attacks against the USA embassies in Kenya and Tanzania; and he is also accused of being a member of Al Qaeda. Darkazanli was an authorized user. On January 22, 1997, there were two payments for the amount of 5,955 German Marcs which were sent from Caja Madrid accounts: number 17453000818548, in the name of Waheed Koshagi Kelani and one from the account 17453000870736, owned by Ahmad Koshagi Kelani.

Syrian-born Ahmad Koshagi Kelani and his brother Waheed Koshagi Kelani, are accused of financing al Qaeda activities. They were arrested on December 18, 2003 in Madrid, Spain a day after Garzon issued a 700-page indictment against 35 other people, including al Qaeda leader Osama bin Laden. At least eight of the 35 have been linked to the September 11, 2001, attacks on New York and Washington.

8. During a 1993 business trip to Cyprus to purchase a ship for bin Laden, Wadih el-Hage asked that all related business documents be sent to his business address in Germany, which was Darkazanli's business address. When asked by German authorities about el-Hage, Darkazanli admitted to knowing that el-Hage visited Germany in the mid-90s with unmet aspirations of selling uncut diamonds to local diamond dealers. Therefore, al-Qaeda used Darkazanli both to facilitate and to legitimize its terrorist activities by camouflaging its existence and business location behind an active "front" company.

9. German authorities also discovered that Darkazanli was an authorized user on the bank account number 4070207 with the Deutsche Bank of Hamburg, owned by Abdulrahman Alfahad.

Alfahad had close links with the charities in Bosnia-Herzegovina and that he had used their money to set up the Rentakar Company which "used its cars to operate unnoticed in the Balkans, transporting terrorists, drugs and explosives." German intelligence agency BND had received reports that the Rentakar Company was linked to the Saudi intelligence agency and that "the Saudi High Commission is involved in helping terrorists."

Darkazanli was an authorized user. German authorities have detected connections of this account with the brothers Waheed and Ahmed Koshagi Kelani, which are the following:

On January 29, 1996, there was a deposit of 2,698.69 German Marcs, described as "helping family," the sender was Matilde Victoria Gonzalez, Ahmad Koshagi Kelani's wife, resident of 5 Nuestra Senora de Fatima Avenue, Madrid.

On December 12, 1996, there was a payment for the amount of 3,022 German Marcs, described as "helping family," the beneficiary was Koshagi Victoria Sara.

On July 17, 1996, there was a deposit in the amount of 10,975 German Marcs, described as "helping family," the sender was Matilde Victoria Gonzalez.

On December 27, 1996, there was a deposit of 5,775 German Marcs, described as "helping family," the sender was the indicted Ahmad Kashogi Kelani.

On December 25, 1996, there was a deposit of 3,993 German Marcs, described as "helping family," the sender was the indicted Ahmad Kashogi Kelani.

On December 2, 1997, there was a deposit of 3,993 German Marcs, described as "helping family," the sender was the indicted Ahmad Kashogi Kelani.

10. In addition to the two previously mentioned people who are associated with Imad Eddin Barakat Yarkas constituting the Spanish al-Qaeda cell, Darkazanli also knew Mohamed Ghaled Kalaje Zouaydi and Mohamed Zaher Asade. The relationship between Zouaydi and Darkazanli was as follows:

On May 22, 1999, Darkazanli received \$8,000 from the company "M/S Maher International" which is owned by Zouaydi. Possibly, the receipt is related to a financial transaction of Abdullah Zammar because in Zammar's account with Deutsche Bank, Number 4942058, it was registered a transfer on May 25, 1999 from Saudi Arabia for 15,000 German Marcs. The sender was "M/S Maher International." This transfer was made through "Al Rahji Banking and Investment Corporation" in Riyadh, Saudi Arabia. On May 28, 1999, Zammar cashed 15,000 German Marcs from his account and on July 21, 1999, he made a deposit for 15,000 German Marcs in his account. On July 22, 1999, Zammar transferred his money to an account of the company "Proyectos Y Promociones Sabadell," in Madrid, which is Zouaydi's Real Estate/Construction Company.

Abdulfattah Zammar received the 15,000 German Marcs on May 25, 1999 following Darkazanli's instructions to buy a car in Germany for Kalaje. Since Zammar did not find the correct car, Darkazanli told him to transfer the money to the company Proyectos Y Promociones Sabadell in Madrid. This company is Zouaydi's "Projects and Promotions" Real State/Construction company.

11. In an interview with German police a few days after 9/11, detectives questioned Mohamed Haydar Zammar, a Syrian-born Hamburg resident. They asked whether he knew Darkazanli and he replied, "I know him well. He is a friend whom I have known for a long time." Police later learned that it was one of Zammar's brothers, Abdulfattah, who had driven Darkazanli to the Madrid meeting with Spanish al-Qaeda leader, Yarkas in January 2000. Darkazanli had met in Madrid with Imad Eddin Barakat Yarkas, the accused Al Qaeda leader in Spain, who is from Darkazanli's hometown of Aleppo, Syria. The meeting, monitored by Spanish police who were watching Yarkas, included some suspected Al Qaeda figures.

12. During the searches carried out at the company Proyectos Y Promociones Iso, owned by Muhamed Galeb Kalaje Zouaydi and Bassam Dalati Satut, the police confiscated a business/Visa card on which the following was printed:

“Mushayt for Trading; The name Muhammed Galeb Kalaje, Marketing Manager”
Also, the following telephone numbers and address:
“Tel: 966-2-6443068. Fax: 966-2-6430487. PO Box 20729 Jeddah 21465. Al
Cornish Comm. Center. 7th Fl. Office No. 750. Hay Al Balad-Jeddah. Saudi
Arabia.”

On the back of the card, the following annotation was handwritten with a ball point pen:

“Call: Gasoub, Sahiji Tawileh, Abo Zainab, Abo Lias, Walid Zain, and Abo Fares.”

It is believed that “Abo Lias” is Mamoun Darkazanli.

13. In 1996, Darkazanli met another member of the Spanish cell, Muhammed Galeb Kalaje Zouaydi, who is imprisoned in Spain for financially supporting al-Qaeda. A handwritten document confiscated in searched of Zouaydi’s Spanish residence and business refers to “gifts” he made, while still in Saudi Arabia, to “brothers” in Germany. Another document refers to money kept in Germany by Abu Ilias, Darkazanli’s alias. The total amount of money sent to Germany was \$16,780, part of which went to Darkazanli.

14. Darkazanli acted as a middleman channeling money between Zouaydi and the hijackers. Darkazanli was described by the Spanish judge Baltasar Garzon as “belonging to the most intimate circle of Mohammed Atta.” Also, Darkazanli himself admitted helping Atta establish a bank account. Darkazanli also admits knowing two other pilots, Marwan al-Shehhi and Ziad Jarrah. These three hijackers, Atta, al-Shehhi, and Jarrah, were in the same group of friends as Darkazanli, with whom they attended the same Hamburh mosque, al-Quds.

15. The Chicago Tribune reported that between 1995 and 1998, The Twaik Group deposited more than \$250,000 in bank accounts controlled by Mamoun Darkazanli in the northern port city of Hamburg. The Twaik Group, along with Rawasin Media Productions, which is also linked to al-Qaeda, has connections to the Saudi Arabian intelligence agency and Prince Turki bin Faisal.

16. In 1997, the FBI led a raid on the residence of Osama bin Laden’s personal secretary, Wadih el-Hage. In el-Hage’s possession was a business card for “Anhar Trading Company,” listing el-Hage as its director and giving two addresses for the company’s location. The US address coincides with el-Hage’s home address in Arlington, Texas; whereas, the address in Germany “Uhlenhorster Weg 34, 2000 Hamburg 76” matched exactly the location, phone and fax numbers for Mamoun Darkazanli and Darkazanli Import-Export Company.

17. Darkazanli’s financial relationship with an al-Qaeda operative was with Mamdouh Mahmud Salim, a resident of the United Arab Emirates. Imprisoned in the US, Salim once directed Wadi Aqiq, an umbrella company for bin Laden’s financial empire. Salim was also

engaged in al-Qaeda military training and, around 1993 or 1994, he tried to obtain uranium in an effort to create a nuclear bomb for al-Qaeda. Between 1995 and 1998, Salim made frequent trips to Germany. Washington officials suspect that, during those trips, Salim tried to procure enriched uranium for al-Qaeda.

18. During these trips to Germany, Darkazanli and the Darkazanli Company provided cover, business collaboration and facilitated communication for Salim. For instance, in 1995, Darkazanli co-signed with Mamdouh Salim a joint Deutsche Bank business account, over which he had power of attorney. Darkazanli also acted as Salim's host, translator, and business partner in Germany. In addition, the Darkazanli Company's specialty in the import-export of electronic appliances was a suitable cover for procuring technical equipment for al-Qaeda. In an interview given to German authorities following the attacks of September 11, Darkazanli admits to working with Salim, but only on one deal sometime between 1993 and 1995.

19. According to Darkazanli's lawyer, Andreas Beurskens:

One is the disclosure that Darkazanli received at least \$16,000 from Mohamed Kaleb Kalaje Zouaydi, a wealthy Spanish-Syrian arrested in Madrid and accused of funneling hundred of thousands of dollars to al-Qaeda and other radical organizations.

Another is the discovery by German investigators that Darkazanli was previously employed by Abdul-Matin Tatari, an Aleppo-born textile exporter in Hamburg whose own links to the September 11 hijackers were under investigation by German police.

Police sources say they have expanded the Darkazanli investigation to include his business transactions over the years.

Darkazanli's relationship with other al-Qaeda members in Hamburg

20. Darkazanli is connected with al-Qaeda logistics man, Said Bahaji. Darkazanli stated that he attended Bahaji's wedding. German investigators believe Bahaji played a key support role in the September 11 plot. A videotape made at the wedding, confiscated by police in a post-September 11 search of Bahaji's apartment, included a harangue by Binalshibh on the holy war against the "enemies."

21. Darkazanli was employed by Abdul Matin Tatari, a Hamburg businessman with ties to al-Qaeda. Police were investigating whether Tatari helped extremists get into Germany by posing as buyers and getting immigration papers at one of his import-export companies. In another one of his companies, Triple-B Trading, Tatari is a business partner with three individuals who were directors of the al-Qaeda front Benevolence International Foundation, which was designated by the US as a terrorist entity. German prosecutors have also alleged that Tatari's son attended the Islamic group at Hamburg Technical College along with the hijackers.

Darkazanli's Trips to Spain

22. Darkazanli was a regular contact of Imad Eddin Barakat Yarkas (his name was mentioned previously). Everytime Darkazanli traveled to Spain, specifically to Madrid, he would stay in Yarkas's house located at 85 Pablo Neruda 4th. In the searches carried out in Yarkas's, aka Abu Dahdah, house, they found a personal address book with numbers 491752459717 and 490402277536 beside the name "Mamun" and photographs corresponding to Darkazanli.

23. The first trip of Darkazanli to Madrid happened in 1997. In May of 1998 he traveled to Madrid for a second time, when he interviewed with Yarkas and Kelani (both names mentioned previously). Darkazanli's third trip to Spain occurred on January 19-21, 2000, where he stayed at the home of Yarkas. The brother-in-law of the indicted Taysir Alouny Kate named Abdulfattah Zammar was also staying in the house. Taysir Alouny Kate was a journalist working for the Qatar-based Al-Jazeera television network. He was arrested in November 2004, charged with belonging to a terrorist organization, and is currently in prison in Spain.

24. During Darkazanli's stay in Madrid, investigators verified that he participated in the following meetings:

Yarkas was accompanied by Darkazanli and Zammar in a vehicle with license M-4835-MP and drove to the Mosque known as M-30 in Madrid. IN this place they contacted two people considered by the police as members of the Tunisian organization En Nahda.

Yarkas, Darkazanli, and Zammar also had meetings in the house of the indicted Waheed Koshaji Kelani, located at 4 Loyola Street in Madrid.

There were also meetings with Yarkas, Darkazanli, Zammar, Waheed, and his brother Ahmed Koshaji Kelani and Taysir Alouny Kate.

25. The fourth trip of Darkazanli to Spain happened in July of 2001 and he again met with Yarkas. This time, Darkazanli was coming from Morocco where he had attended the celebration of the 2000 wedding of his friend Abdulfattah Zammar, who is married to the sister of Taysir Alouny Kate's wife.